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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

BUCKEYE TREE LODGE AND SEQUOIA
VILLAGE INN, LLC, a California limited
liability company, on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

EXPEDIA, INC., a Washington corporation;
HOTELS.COM, L.P., a Texas limited
partnership; HOTELS.COM GP, LLC, a Texas
limited liability company; ORBITZ, LLC, a
Delaware limited liability company; TRIVAGO
GmbH, a German limited liability company;
VENERE NET S.R.L. DBA VENERE NET,
LLC, an Italian limited liability company; and
EXPEDIA AUSTRALIA INVESTMENTS PTY
LTD., an Australian private company,

Defendants.

Case No. 3:16-cv-04721-VC

CLASS ACTION

JOINT STIPULATION TO ENTER:

**1) STIPULATED PROTECTIVE ORDER; AND
2) STIPULATED ORDER RE: DISCOVERY OF
ELECTRONICALLY STORED INFORMATION**

Plaintiff Buckeye Tree Lodge and Sequoia Village Inn, LLC, and Defendants Expedia, Inc., Orbitz, LLC, Hotels.com, L.P., and Hotels.com GP, LLC, Venere Net S.r.L., and Expedia Australia Investments Pty Ltd. (collectively, "Expedia") respectfully submit the following stipulation to enter: 1) the Stipulated Protective Order; and 2) the Stipulated Order Re: Discovery of Electronically Stored Information submitted by the Parties with this Stipulation.

Stipulated Protective Order

The Stipulated Protective Order is based on the Court's Model Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets. Pursuant to the Court's Civil Standing Order, the Parties identify the following deviations from the model order:

- The optional paragraph 2.4, Designated House Counsel, is deleted.
- There is no designation for "HIGHLY CONFIDENTIAL – SOURCE CODE."
- The Parties shall have 30 days, rather than 21 days, to designate portions of deposition testimony pursuant to the Stipulated Protective Order. (§ 5.2(b).)
- The Parties will not require that depositions containing Protected Material have a title page followed by a list of all pages that have been designated as Protected Material. (§ 5.2(b).)
- The Parties shall have 28 days, rather than 21 days, to seek judicial intervention for any dispute regarding a designation. If the Court rules against a party challenging a designation on two separate occasions, that party will have the burden to bring future motions to challenge designations, but the designating party will retain the burden of persuasion. (§ 6.3.)
- The Parties will not require that deposition testimony containing Protected Material be separately bound. (§ 7.2(f).)
- The Parties will not require the procedures for approving or objecting to disclosure of Protected Material to designated house counsel or experts found in § 7.4 of the Model Order.
- The Parties will not require the prosecution bar found in § 8 of the Model Order.
- The Parties have removed the source code paragraph found in § 9 of the Model Order.

Stipulated Order Re: Discovery of Electronically Stored Information

Pursuant to the Court's Guidelines for Discovery of Electronically Stored Information, the Parties request that the Court enter the attached Stipulated Order Re: Discovery of Electronically Stored Information.

IT IS SO STIPULATED.

Dated: January 20, 2017

PATTERSON LAW GROUP

By: /s/ Allison H. Goddard

Attorneys for Plaintiff and the Class

Dated: January 20, 2017

COVINGTON & BURLING LLP

By: /s/ Megan Rodgers

Attorneys for Plaintiff and the Class

ATTESTATION

I, Allison H. Goddard, hereby attest, pursuant to Civil L.R. 5-1, that I have received authorization to electronically sign and file this document from each of the persons identified in the signature block.

Dated: January 20, 2017

By: /s/ Allison H. Goddard